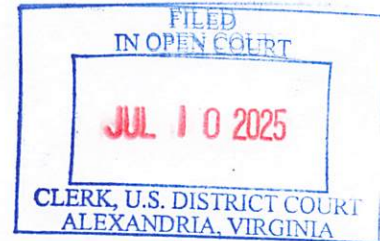


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA

v.

CHRISTOPHER STUART CRITTENDEN,

Defendant.

Case No. 1:25-cr-167

Hon. Michael S. Nachmanoff

STATEMENT OF FACTS

The United States and the defendant, CHRISTOPHER STUART CRITTENDEN, agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. On March 13, 2025, the defendant visited Washington Dulles International Airport, a commercial service airport within the Eastern District of Virginia, to travel on a United Airlines flight departing from Gate D12.

2. After drinking multiple alcoholic beverages, the defendant became irate about a flight delay and seating assignment and shouted expletives at one of the United Airlines gate agents stationed at Gate D12 ("the victim").

3. The victim communicated with the flight captain, who was on the jet bridge, to inform the captain that the defendant was likely inebriated and verbally harassing United Airlines staff. The captain came to Gate D12 to speak with the defendant and ultimately informed the defendant that he could not fly on the aircraft. The victim then began making routine gate announcements as a part of his normal duties for United.

4. The defendant then knowingly physically assaulted the victim by punching him in the face. The force of the punch temporarily knocked the victim unconscious. He sustained

injuries, including contusions, bleeding, and significant pain in his head and shoulder areas and has had to have follow-up dental care as a result of the assault. The defendant also attempted to punch another gate agent, but that gate agent ducked and avoided the assault.

5. As a United Airlines gate agent, the victim is an air carrier employee who has security duties within the airport that include performing check-in and boarding functions. By knowingly punching the victim, the defendant both interfered with the performance of the victim's security duties and lessened the victim's ability to perform said duties. Specifically, the employee was unable to perform ticketing and boarding functions, including checking in passengers for the departing flight, and other personnel were called to assist in his absence.

6. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reasons.

7. This statement of facts includes those facts necessary to support the defendant's guilty plea. It does not include every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all the facts surrounding the defendant's case.

Respectfully Submitted,

Erik S. Siebert
United States Attorney

By: Meredith Clement
Meredith R. Clement
Special Assistant United States Attorney
April N. Russo
Assistant United States Attorney

Date: July 10, 2025

I have read the above Statement of Facts and carefully reviewed every part of it with my attorney. After consulting with my attorney, I, CHRISTOPHER STUART CRITTENDEN, hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



CHRISTOPHER STUART CRITTENDEN

I am Rammy Barbari, the defendant's attorney. I have carefully reviewed the above Statement of Facts with the defendant. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Rammy Barbari
Attorney for CHRISTOPHER STUART CRITTENDEN